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January 31, 2020

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

United States v. Kukushkin, et al. 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel for Andrey Kukushkin, a defendant in the above referenced matter. With **the consent** of the government and Pretrial Services, we write to request modification of Mr. Kukushkin's bail conditions to amend his home detention condition to a curfew, the latter of which is to be set by Pretrial Services. The request is occasioned by Mr. Kukushkin's work schedule and obligations as well as with his compliance to date.

Mr. Kukushkin appeared for arraignment before this Court on October 17, 2019. He was released upon the signing of a \$1 million appearance bond, secured by property, \$100,000 in cash, and three financially responsible persons. Mr. Kukushkin was also placed on regular Pretrial supervision and home detention with location monitoring. His travel was restricted to the Eastern and Southern Districts of New York as well as the Southern, Central and Northern Districts of California. Mr. Kukushkin is permitted to leave his home for work related purposes as well as for other reasons with the approval of Pretrial Services. By all accounts, Mr. Kukushkin has been fully compliant with the terms of his pretrial release. However, his work schedule is variable, involves various locations, significant travel, and numerous meetings, some of which are last minute.

Accordingly, Mr. Kukushkin **with the consent** of the government and Pretrial Services respectfully requests that the terms and conditions of his release be amended to provide for a curfew, to be set by Pretrial Services, instead of home detention. All other conditions of his release, including his travel restrictions and location monitoring as well as regular Pretrial supervision would remain unchanged. As noted, we have conferred with Mr. Kukushkin's Pretrial Services Officers, Nelson Barao and Joshua Rothman, as well as with the government, and there

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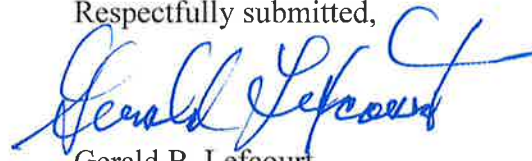
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is no objection to the application, which will better facilitate supervision given his work obligations.

In light of the foregoing, we respectfully request that the Court modify Mr. Kukushkin's release conditions as outlined above. We thank the Court for its consideration.

Respectfully submitted,



Gerald B. Lefcourt

cc: All counsel (via ecf)
Nelson Barao, United States Pretrial Services Officer (via email)
Joshua Rothman, United States Pretrial Services Officer (via email)